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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 08-399 PJH
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	
JAIME SALCEDO-MENDOZA,)	
)	
Defendant.)	
_____)	

On July 2, 2008, the parties appeared before the Court for the initial status in this case. At that time, the parties requested, and the Court agreed, to exclude all time under the Speedy Trial Act between July 2, 2008 and July 23, 2008 because the government had just produced the defendant's deportation tapes earlier that day. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of defense counsel. 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by granting

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1 such a continuance outweighed the best interests of the public and the defendant in a speedy trial.
2 18 U.S.C. § 3161(h)(8)(A).

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4 SO STIPULATED:

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6 JOSEPH P. RUSSONIELLO
United States Attorney

7
8 DATED: July 7, 2008

/s/

9 TAREK J. HELOU
Assistant United States Attorney

10
11 DATED: July 7, 2008

/s/

12 RONALD TYLER
Attorney for Defendant JAIME SALCEDO-MENDOZA

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14 For the reasons stated above, the Court finds that exclusion of time from July 2, 2008 through
15 July 23, 2008 is warranted and that the ends of justice served by the continuance outweigh the
16 best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(8)(A).
17 Failure to grant the requested continuance would deny the defendant effective preparation of
18 counsel, and would result in a miscarriage of justice. 18 U.S.C. §3161(h)(8)(B)(iv).

19
20 SO ORDERED.

21
22 DATED: _____

23 THE HONORABLE PHYLLIS J. HAMILTON
United States District Judge